

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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Bienvenido I. Lugo-Merchant
Plaintiff,
v.

Civil Action No. 05 11317 NMG

U.S. DISTRICT COURT
DISTRICT OF MASS.

**Peter Tsickritzis, Kevin Kingston,
and United Liquors Limited et al.,**
Defendants

**FIRST SET OF INTERROGATORIES PROPOUNDED BY THE PLAINTIFF TO
DEFENDANT-Jonathan Barry**

Plaintiff, Bienvenido I. Lugo-Merchant, hereby propounds the following interrogatories to Defendant, Jonathan Barry, to be answered fully, separately, in writing and under oath.

INSTRUCTIONS

In answering these interrogatories, Defendant- Jonathan Barry, should follow the same instructions given to the Plaintiff when demanding from him answers to the **First Set of Interrogatories** sent by their legal representatives and counsel.

DEFINITIONS

As used herein, the terms used in these interrogatories shall have the same meaning as in the terms given to the Plaintiff when demanding from him to answer a **First Set of Interrogatories** by the defendants, their legal representatives and counsel. New terms that are not understood can be found at any legal or regular dictionary.

INTERROGATORIES

1. With respect to the person answering these Interrogatories, please state:
 - a. Name
 - b. Address (es)
 - c. Residence telephone numbers
 - d. Job title
 - e. Name of superiors
 - f. Date when started employment with the defendant
 - g. Salary
 - h. Marital status [name of spouse].
2. Set forth the number of times you have met with the Plaintiff since 1999 to the present.
3. State whether the defendant ever submitted false information in connection with the plaintiff, and, if so explain the action in complete detail.
4. If at any time from June 1999 to the present the defendant has had a document retention or document destruction custom, practice, program or policy, set forth:

- a. The identity of each person who was responsible for administering each custom, practice, program or policy.
5. If at any time, the defendant has destroyed any document which in any way would be responsive to any of these interrogatories or to the plaintiff's request for the production of documents, set forth:
 - a. The identity of each such document;
 - b. The date of the destruction; and
 - c. If it was destroyed pursuant to a document retention or document destruction policy, state why it was destroyed.
6. Identify and provide a list of all documents that the defendant intends to utilize at trial and provide a true copy of each such document.
7. Identify and provide a list of all other lawsuits, settlements and legal actions where the defendant was named as a party since 1985 to the present.
8. State by name, last known address and present position with the defendant any and every person referred to in the previous interrogatory.
9. State whether or not the defendant has a policy with respect to hiring persons who are unable to work on any determined time because of their religious beliefs. Further, state whether these policies are in writing, and, if so, please without a formal petition to produce documents, attach copies.
10. State in detail, all hardship that will inure to the business of the defendant if the defendant were to accommodate the religious belief and practices of the plaintiff. Further, state if the defendant has ever hired a person with religious beliefs conflicting the defendant work schedule and what problems, if any, have resulted from such an employee.
11. State whether or not the defendant would now hire the plaintiff. Further state if the plaintiff, if hired, would be required to work on Saturday or when having any religious observance.
12. State by name, any and every worker who after asking for a leave for social activities were not terminated. Further, state:
 - a. If the petition was granted, and
 - b. If the workers were demoted, harassed, or otherwise subjected to discrimination.
13. Did you or anyone near you ever meet with anyone having action at MCAD/EEOC against the Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 21 2006, this document was served upon the defendant's counsel JACKSON LEWIS, by first class mail, postage paid.

Respectfully submitted, Bienvenido I. Lugo-Marchant
Pro se, in forma pauperis

